

From: [Will Wilson](#)
To: [Moore, Gary](#); "[Mickey Edmondson](#)"
Cc: "[Terry Andrews](#)"; "[Nicole Bealle](#)"; [Tidmore, Guy](#); "[Larry Peyton](#)"; [Joel Hartley](#)
Subject: RE: ASTs
Date: Monday, April 20, 2015 10:04:39 PM

Sounds great Gary. A session that includes EPA and TCEQ together would be ideal. If Mickey is available to represent the Trustee that would be great, or we can get with him after. Just let us know when/where.

Will Wilson

From: Moore, Gary [mailto:Moore.Gary@epa.gov]
Sent: Monday, April 20, 2015 4:59 PM
To: Will Wilson; 'Mickey Edmondson'
Cc: 'Terry Andrews'; 'Nicole Bealle'; Tidmore, Guy
Subject: RE: ASTs

Will:

I am talking with Terry Andrews with TCEQ to confirm a meeting time this week. We would like to have Nicole involved as well. I talked with the EPA RCRA Enforcement Chief, Guy Tidmore, and briefed him on what we were doing and he did not have an issue on the EPA side. I don't think TCEQ will have an issue but I can't speak for them.

Also, the Bankruptcy Trustee is still involved and he will need to do an emergency order with the court to get them to approve so we need to make sure we keep him involved. I don't know how easy or difficult this will be but we need to let him know as quickly as possible.

Thanks

Gary Moore

Federal On-Scene Coordinator

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From: Will Wilson [mailto:willw@lonestarecology.com]
Sent: Monday, April 20, 2015 1:50 PM
To: Moore, Gary; 'Mickey Edmondson'
Cc: 'Terry Andrews'; 'Nicole Bealle'
Subject: RE: ASTs

Gary-glad to hear about ST1. That is a major milestone and with that completed hopefully we can move on to getting the tanks off site promptly.

Would ya'll have time to get together tomorrow (Tuesday) to discuss next steps? Other than pressure washing the bottoms as they are picked up for transport it appears to us that no additional cleaning should be required as our previous inspection disclosed no residual materials in the tanks. The issue we need to resolve is how to make sure that our proposed management plan for the tanks is acceptable to EPA and TCEQ. We're available pretty much any time Tuesday or Wednesday morning through lunch time. I'm out of town Thursday but Friday would work for us as well. Please let me know what works for ya'll. I assume we would meet at the CES site but would be happy

to host out here at Lonestar or at my other office in the Galleria area if either would be more convenient.

Will Wilson

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From: Moore, Gary [<mailto:Moore.Gary@epa.gov>]

Sent: Thursday, April 16, 2015 3:05 PM

To: willw@lonestarecology.com; Mickey Edmondson

Cc: Terry Andrews; Nicole Bealle

Subject: CES: ASTs

Will/Mickey:

We have completed the removal of the materials out of ST1. Therefore, all of the metal tanks in the in the outside tank farm have been completed. We need to talk about what needs to happen next. I have attached documents that I received from the TCEQ. We all want to make sure that these tanks can be taken off-site for scrap or reuse and that we do what is necessary to avoid any regulatory issues. The EPA does not have any additional funding for any additional significant cleaning of these tanks.

We did conduct some pressure washing of these tanks from the top and from outside the manway. These tanks will need to be inspected by those that will take the tanks to see if they meet their requirements for scrap or reuse. We will try to work with them but the funding is not available for the EPA to do any additional cleaning.

We have 2 poly tanks that we are still trying to find a home for and then we will be out of the that area except for cleaning of the secondary containments and sumps.

The time may be right to begin the take down and the removal of these tanks off-site.

Thanks

Gary Moore

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